

Submission for the National Climate Change White Paper Parliamentary Hearing process

**From the Renewable Energy Centre
(20 October 2011)**

Content

- **Impressive improvement** between CC Green and White paper
- **Remaining Issues:** Framework is not yet adequate
 - **Water**
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 - **Biodiversity and ecosystem**
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 - **Energy** - Cost of Nuclear versus PV panels
- **Roles, Responsibilities and Institutional Framework**
- **Education** (and awareness)
- **Inputs and Resources Mobilisation** - Technology
- **Conclusion**

Improvements between GP and W/P

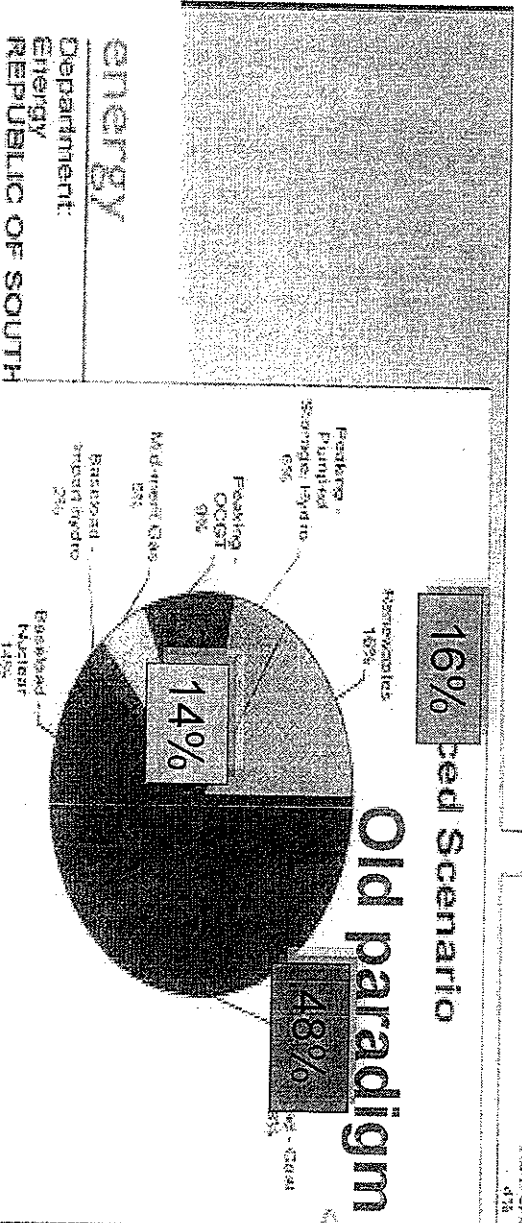
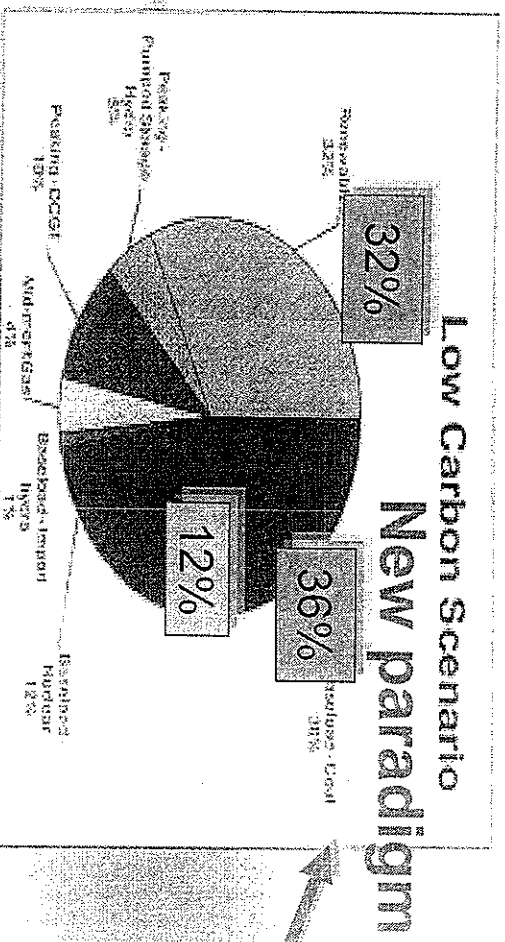
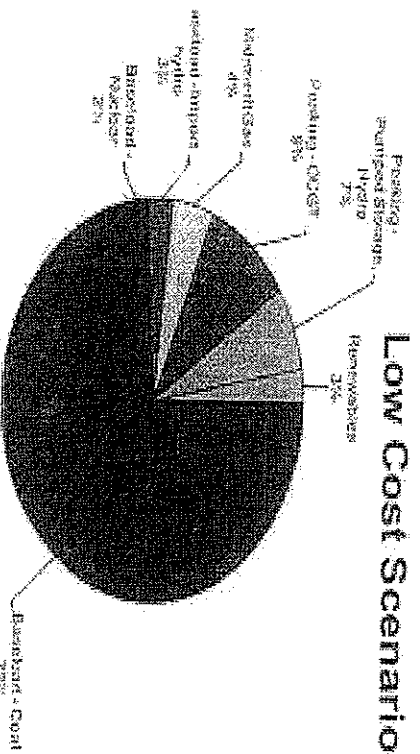
- Many more details. **No longer only a list of intents** f.e outcome base monitoring system (12.3.1)
- New focus on **building resilience** (4.)
- New important chapter on **education**, that recognize the need to **mainstream CC knowledge into education and training curricula** (however that requires further details and date line (11.2)).
- **Two years** for carbon-heavy sectors to set carbon budgets but SA needs to set its **own carbon budget** beforehand
- Surprising that although “civil society needs to **officially evaluate, comment on and respond to** initiative of government and the privates” (10.3.2), it has been given **only a week** to comment this important new document.

Remaining issue is the WP Framework itself

- **Lack of long term vision and related political will from the National Planning Commission that:**
 - Gives a clear **Post Carbon (PC)** objective to articulate a new **growth and poverty/ unemployment reduction paradigms**
 - Questions **GDP** as the adequate indicator in dealing with human and environmental impacts
 - Defines the “**drastic changes that will cut through all sectors and demonstrate new ways to produce and consume**” (4.1)
 - Hence questions **Business As Usual** and **push for bigger RE ambition** (32% instead of 16% RE in IRP2) (see next slide)
 - Would consider **Investment for the future instead of cost for the present** (so often mentioned in this document)
- **Clear that SA remains on the fence and chooses:**
 - a “**lower**” instead of a “**low**” or “**post**” carbon vision.
 - **business before people** (“consult industries re carbon budget - least cost option” (6.5) – GHG not a pollutant (10.6))
- **It plans a new model in an old paradigms: as impossible as to keep goats and cabbages together**

IRP2 scenarios

- **POST CARBON scenario enforced in IRP2** as it is the minimum requirement for adequately responding to CC and water scarcity threats



New Capacity Allocation Technology

Technology	Allocation
Renewables	33%
Baseload - Nuclear	25%
Peaking - OCGT	14%
Medium - Gas	11%
Baseload - Coal	9%
Baseload - Import Hydro	4%
Peaking - Pumped Storage	4%

Crucial issue = Framework

- Hence still exist contradictions, **vagueness and un decisiveness:**
 - To recognise SA's vulnerability (locally and globally) to its **enormous carbon dependency**
 - To recognise **LOCALISATION** of food, energy, **water, employment** a pillar of CC response
 - To defines a CC adaptation and mitigation fund sourced from **direct carbon taxes**
 - To recognises “**market solution**” such as *Clean Development Mechanism (CDM)*, Cap and Trade and new but **unproven technologies** such as Carbon Capture and Storage (CCS) **delaying tactics & dangerous distractions.**
 - Carbon trading, endorsed by this WP (10.7.2) but **denigrated by Treasury** (Carbon tax doc.)

Crucial issue = Framework

- No drastic **Post carbon** decisions, that questions the present **growth paradigm** despite recognizing the numerous and drastic facts and requirements such as:
 - **cost of early actions** will be far less than the costs of delay and inactions (Intro)
 - a **precautionary principle** is required (3.);
 - major shift towards sustainable consumption and production patterns, which **decouple growth and development** (4.1);
 - In the absence of effective adaptation response, such level of damage would certainly **threaten and even reverse** many development gains made in SA; (5.1)
 - CC represents the **most urgent and far-reaching challenge** of our time (conclusion)

Despite recognizing that “there will also significant short and long-term **social and economic benefits**, including improved **international competitiveness** (introduction)

Crucial issue = Framework

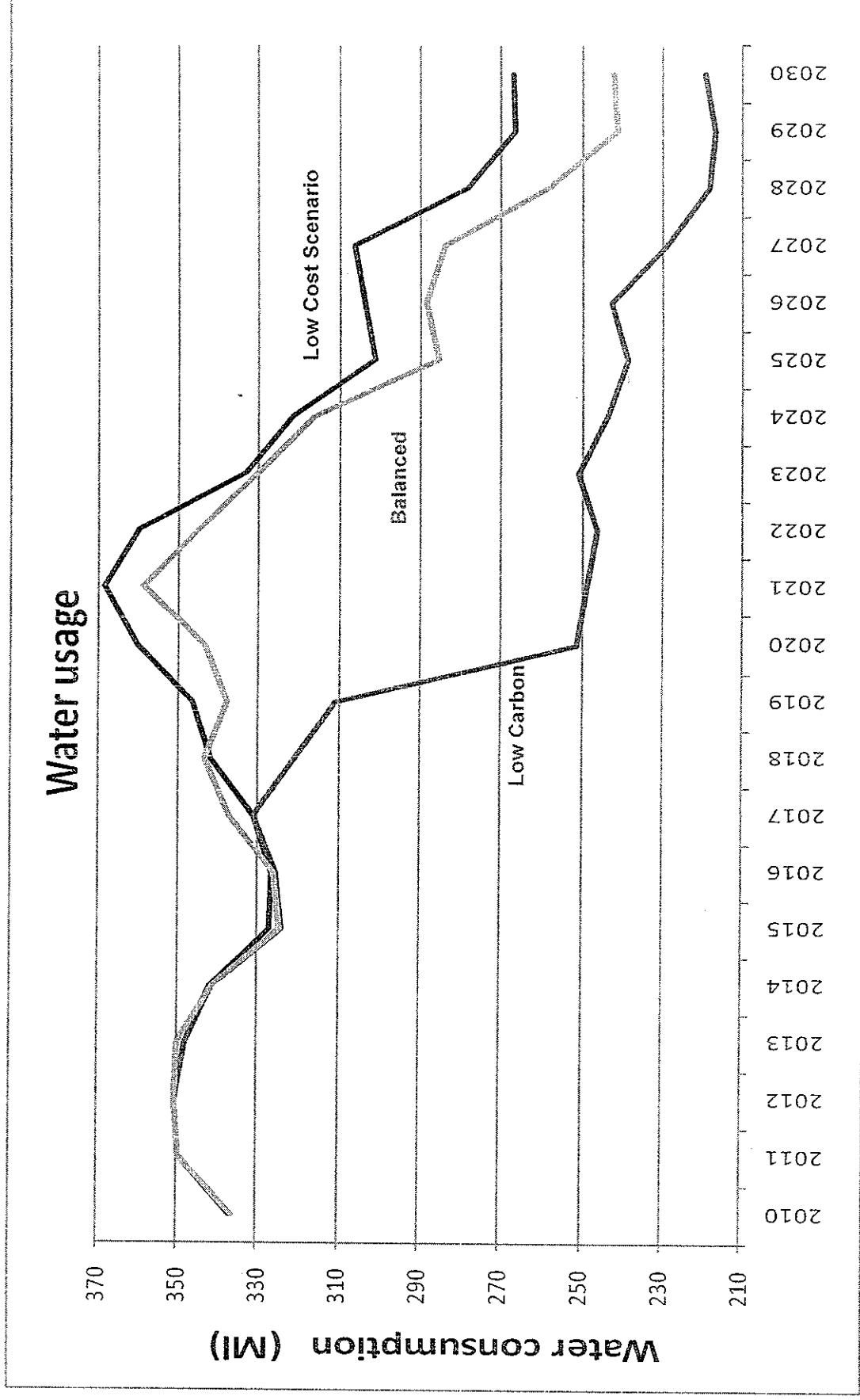
Absent PC vision and related political will that render following proposals quite **unlikely** :

- A weak administration, which allows businesses to drive policies to enforce **Polluter Pays Principle (3.)**
- Forecast an **horizontally integrated planning**, based only on sectoral coordination that is hardly happening(4.2)
- **Behaviour change (4.2) and Climate resilience (5.1)** of a deeply carbon dependant society
- Small scale labour intensive agriculture techniques and models** in a monopoly context (5.3)
- **Peak, plateau, decline** so late and so drastically (6.4)
- **Bottom up and People Centred** through Informed participation (10.3.2) while “Govt and department will start communicating with citizen about CC” (Exec. summary)

Water

- Considering the future CC water related scarcity, we question the rejection of **the IRP2010 Low carbon scenario** that requires much less water per Kwh produced (see IRP2 graph in next slide)
- We questions mega projects in water transfer, desalinisation that cause **large environmental impact, operational costs & power needs (5.2.5)**
- Instead of local water harvesting and recycling in a true **localisation and “resilience spirit” (5.2.6)**

Water needs implications in IRP2010



Agriculture

- A “**Post carbon vision**” would more easily inform this sector’s decisions
- Indeed important recognition Small scale labour intensive agriculture techniques and models **could** reverse the present decrease in agricultural job, contribute to **empowerment, promote food security, conserve soil quality and structure and contribute to biodiversity (5.3**
- But **too vague suggestions** about a climate – resilient rural development planning, climate resilient land use, climate –smart agriculture, early warning and education/awareness that all **still have to be defined.**
- **Lack of clear position regarding critical issues such as**
 - **localisation of food production**
 - Environmental impacts of **monoculture**
 - Develop Conservation Agriculture & Permaculture or organic production
 - Responsible producer, accountable to local clients
 - GMO [monopolies] that kill biodiversity and producer autonomy
 - **Secured lands** for small scale agriculture

Human Health

- A **“Post carbon vision”** would also more clearly inform this sector’s CC responses
- Indeed recognition of importance of food security and nutrition status and role
- But still long list of intents with little details
- It is recommended to equally mitigate CC health impacts through a **NHI partly funded by CC global fund**
- **Potable water and Health service delivery cranked up and ready ahead of CC impacts**

Biodiversity and ecosystem

- A “**Post carbon vision**” would also more clearly inform this sector’s CC responses
- Important recognition that “CC will compound the pressure on already stressed ecosystems that have resulted from the **unsustainable use and inadequate management** of many SA’s ecosystems and so potentially **reduce the quantity and quality of the services** that ecosystems currently provide (5.5)
- But a long list of vague ways to **integrate CC** into the management of biodiversity and ecosystem services that will involve various sectors, without any specific and **strong mandate** bestowed to any of them

Human settlement

- **Post carbon vision** would more easily inform this sector's decisions.
- Surprised that,
 - despite recognizing the many **local issues** linked to or impacted by CC,
 - despite the fact that local authorities are **closer to the people** and issues impacted to them
 - this policy does not plan to gradually shift these CC responsibilities (including future planning) to **local authorities**

Mitigation

- Despite the facts that mitigation is its constitutional responsibility (const.) as well as a **national priority** (6.1), the SA Govt still **conditions national CO2 reduction** to international funding (6.1)
- National commitment is based on **11 years old** GHG emission data, recognised then as **unreliable**
- Hence what to make out of chap. 6.4 figures ?
- Not clear if GHGs, to be managed by SAAQS (6.7), will be labelled **pollutants** to require **emission license** ?
- Why not otherwise ?

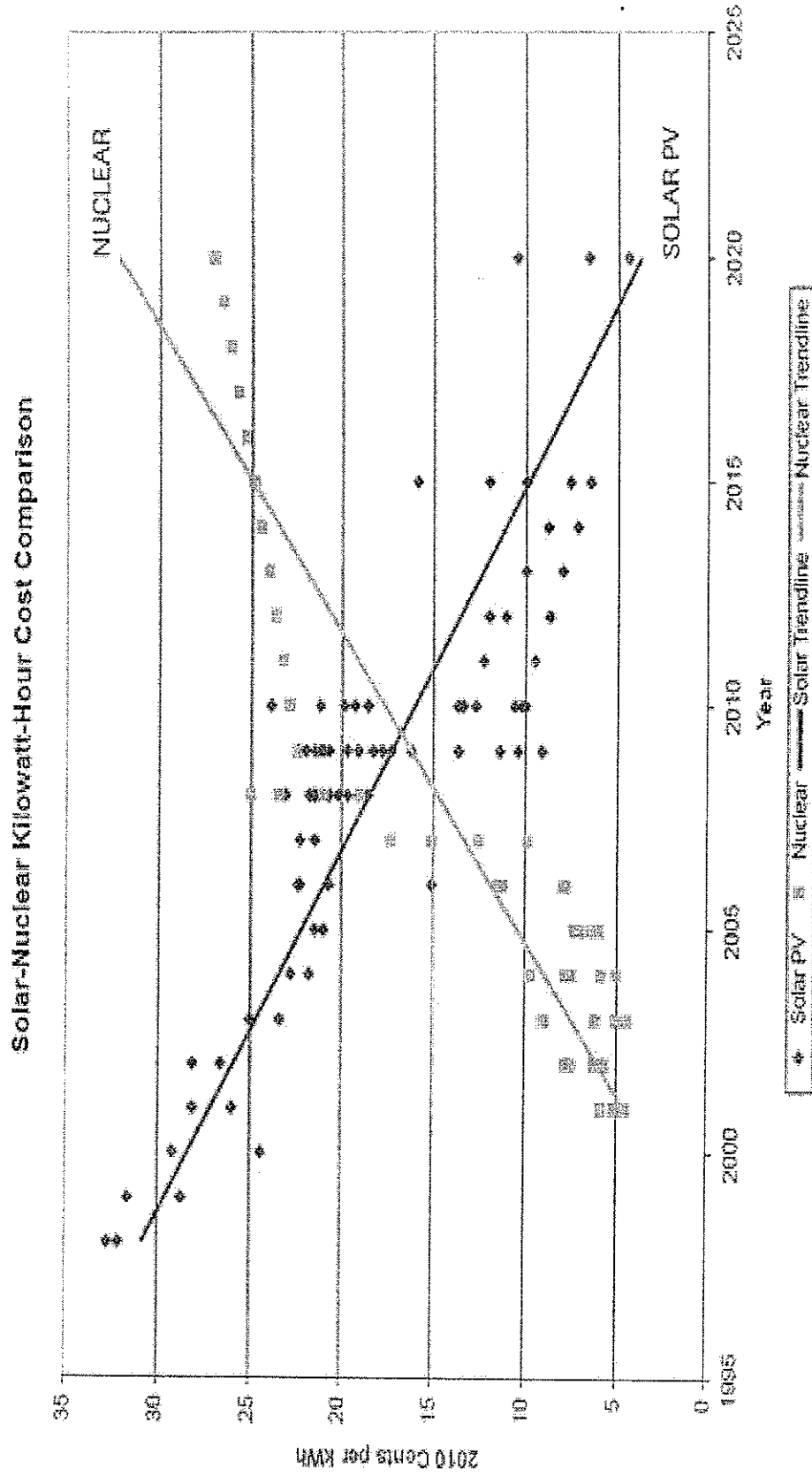
Energy

- **Post carbon vision** would more easily inform this sector's decisions, between others:
 - Same as the IRP2 - simply **too little, too late** as only envisage an absolute decline in carbon emissions **after 2035**;
 - Instead **need of a war-time style mobilization** to accelerate local RE production
 - **LOCALISATION** hence decentralised energy production to become a main criteria to:
 - **local** Create employments
 - **Responsibilise** producer, accountable to local clients
 - **Reduce** transmission lost and environment impacts
 - **Better use** natural local energy resources
 - **Better service** isolated areas
 - **Stop** monopolistic unaccountability and bias
- Hence we refute **[off-peak] “base load”** as a long term IRP2010 requirement

Energy

- Hence we still consider **Kusile** and **nuclear** new power station **unacceptable in a low carbon development** and that money should be used for RE development
- **Besides nuclear has:**
 - A very **long lead time** , **overrun cost** (see next slide),
 - Large construction **footprint**, Unresolved **waste management - Monopolistic** flavour
 - Potential **death threats** in case of increased occurrence of CC related Earthquake and Tsunami (Japan) and possible disasters even in supposedly stable environments.
- Big Yes to **carbon tax**, provided that it **can not be passed on** to customers otherwise polluter **don't pay and don't change**
- **Wonder** why Energy sector is not included into the **adaptation chapter** as SA and its society will have to plan its difficult adaptation from a deep **FF dependency** to a **low carbon future**

Cost of Nuclear versus renewables



Source: Via Climate Justice Now

Roles and Responsibilities and Institutional Framework

- It is doubtful that a mere Department such as DOE could garner **sufficient influence to enforce the CC response** implementation across all sectors
- It is a concern that **too many** “coordinating body” with overlapping responsibilities (instead of one, placed adequately above) will render the CCWP implementation very difficult
- The Provincial level just further **complicate** things
- No role for the **councilors** ? Not the major inter phase with communities ?
- It is why **NPC** (that would have articulate a PC vision), should be made responsible of the **coordination and enforcement of a CC** response policy across the whole Government and various stakeholders.

Education and awareness

- It is appreciated that the WP contains a new important chapter on **education, which** “recognize the need to **mainstream cc knowledge into education and training curricula**” (11.2).
- However that needs further details and date line
- Besides, CC WP is not authoritative and clear enough on f.e small scale, conservation agriculture and permaculture to give adequate inputs for the revision of relevant curricula
- Present weak proposal and disconnection between education and awareness will not succeed to break:
 - the **disjunction** between education/training and the implications of CC and rising oil prices
 - The lack of **understanding of CC implication** and required **drastic changes**
- University to **become autonomous from funding sources** in order to offer objective and broad developmental alternatives in a post carbon paradigms to students’ eager minds.

Inputs and Resources

Mobilisation - Technology

- A Post carbon vision together with the adequate political will would easily inform decisions related to Inputs and Resources Mobilisation – Technology
- Investing as a precautionary [proactive] response to CC will be a mere fraction of the costs due to inaction or little action.
- Besides, the latter are crucial and urgent **investments (not costs)** rapidly mentioned through the doc) to prepare us for a low carbon future and take advantage of the related business opportunities.

Conclusion

- “It is argued that the early adoption of a low carbon growth path can create a competitive advantage for countries taking cognizance of the effects of climate change and environmental pollution.”
- Hence the need of a **post carbon vision** that aligns and drives each and everyone.
- **Together** we can do it.